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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Administration of the ) CC Docket No. 92-237  
North American Numbering Plan ) Phases One and Two

**REPLY COMMENTS OF THE ASSOCIATION  
FOR LOCAL TELECOMMUNICATIONS SERVICES  
ON PHASES ONE AND TWO OF THE NPRM**

The Association for Local Telecommunications Services ("ALTS") hereby submits its reply comments in response to the Notice of Proposed Rulemaking adopted on March 30, 1994, and released on April 4, 1994, FCC 94-79 ("NPRM").

**I. THE ADMINISTRATION OF THE NORTH AMERICAN  
NUMBERING PLAN SHOULD BE PUT OUT FOR BID.**

Some parties offering initial comments on the NPRM suggest that NECA could perform administrative functions for the North American Numbering Plan ("NANP") despite the Commission's tentative conclusion that "NECA could not effectively perform these administrative functions at this time" (NPRM at ¶15).<sup>1</sup> ALTS believes that the Commission was correct in its NPRM in concluding that NECA could not perform the administrative function because "NECA -- like Bellcore today -- would inevitably

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<sup>1</sup> See, e.g., NECA at 9; and BellSouth: "[it] will not oppose [NECA's] assumption of administrative responsibilities if the industry as a whole is satisfied with NECA's impartiality" (at 6).

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face questions regarding its impartiality" (id.).

ALTS suggests that the issue of selecting an administrator for the NANP resembles the choice faced by Bellcore when it needed to obtain an administrator for the 800 data base. Confronted by the fact that its owners were going to be among the largest customers of the 800 data base, Bellcore chose to put the function out for competitive bid. See the initial comment of OPASTCO at 3.

Indeed, the present situation goes beyond the issue of proprietary commercial information that was implicated with the 800 data base. Consistent and efficient administration of NANP is and will continue to be essential for all telecommunications providers. The Commission should require Bellcore to promptly put this function out for bid.<sup>2</sup>

## **II. THE NANP ADMINISTRATOR SHOULD EXERCISE FULL CONTROL OVER THE ASSIGNMENT OF CENTRAL OFFICE CODES.**

Several of the RBOCs comment that the assignment of central office codes should remain unchanged (i.e., stay with the RBOCs) because "code administration is closely allied with and dependent on the particularities of the local network," and also because of

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<sup>2</sup> Some parties suggest that the funding function should be split off from the administrative and policy functions in order to assure impartiality. Bellcore at 6. ALTS agrees that impartiality is critical. However, the amounts involved are sufficiently modest and the opportunity for abuse so small that the need for a separate administrator of funding seems remote.

A more direct approach to the issue of funding would be resolve the issue in the same bidding process which ALTS proposes for the selection of the NANP administrator.

the asserted involvement of state commissions.<sup>3</sup> These arguments only underscore the need to transfer the CO assignment function to a central administrator as quickly as possible.

There is indeed currently a linkage between local networks and NXX availability, and that linkage needs to be broken as promptly as possible if local competition is ever to become a reality. While issues of efficiency and compliance with local regulatory rules are certainly involved in NXX assignment, these concerns in fact contradict the arguments of the RBOCs seeking to retain control over CO assignment. NXX conservation and network efficiency would be far better served by an impartial central administrator, which could implement national standards, than by an RBOC with particular market needs and specific network architecture and vendor commitments.

Similarly, the appropriate needs of local regulatory bodies can be better served by a national administrator than a local RBOC. Reconciliation of federal and state policies is an important issue that should be resolved uniformly and in the open, not through ad hoc arrangements among the RBOCs and local

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<sup>3</sup> Pacific Bell at ii; see also id. at 6: "[A]rea code splits or overlays, and assignments of NXX codes to state certified carriers, are state issues in which the Public Utilities Commission and the state legislature exercise authority. Second, code administration is closely allied with and dependent on the particularities of the local network"; Southwestern Bell at 10: "CO code assignment is fundamentally different than most NANP administrative functions, a more complex subject than first appearance indicates ... state regulatory bodies will have strong opinions and may not be willing to allow the assignment process to be transferred to a centralized national organization."

authorities.

The wisdom of centralized administration of central office codes is amply demonstrated by the fact that three RBOCs urge the Commission in their initial comments to transfer the function to a central administrator. See US West at 9: "US West wants to relinquish its role as a CO administrator, and it wants to do so as quickly as possible" (at 9; emphasis supplied).<sup>4</sup>

**III. BOTH THE COMMISSION AND THE NEW NANP POLICY BODY NEED TO MANDATE TEN DIGIT TRANSLATION IN ORDER TO IMPLEMENT FULL LOCAL NUMBER PORTABILITY AS QUICKLY AS POSSIBLE.**

The many parties addressing 1+ presubscription in their initial comments are a compelling demonstration of the importance of dialing parity to competitive success in public switched telecommunications. As ALTS explained in its initial comments, dialing patterns are just as important to competitive success in local markets as they are in long distance markets, perhaps even more so.

The issue of dialing parity should not be resolved for the long distance market in isolation from the much larger, and still monopolistic local exchange markets. It should also not be delayed until the new NANP policy-making body has been selected

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<sup>4</sup> See also Ameritech at 4-5: "Ameritech supports the Commission's proposal to transfer the local C.O. code assignment function from the predominant local exchange carrier ('LEC') in each Numbering Plan Area ('NPA') to a third party;" and BellSouth at ii: "BellSouth supports the NANP administrator's assignment of all NANP resources at the NPA and Central Office (NXX) level;" (emphasis supplied).

and starts its duties. The Commission should direct Bellcore to promptly commence work now on full and expeditious implementation of local number portability via ten digit number translation. When the new NANP policy body assumes its responsibilities, Bellcore can then transfer to it local number portability planning along with Bellcore's other NANP activities.

### **CONCLUSION**

For the foregoing reasons ALTS respectfully urges the Commission to:

- Put the administrative function of the NANP out for bid;
- Include CO assignment in the NANP administrator's duties; and,
- Require Bellcore and the new NANP policy-making body to pursue prompt implementation of full local number portability through ten digit translation of all dialing in the Public Switched Network.

Respectfully submitted,

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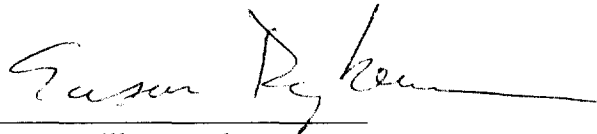
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of June, 1994, copies of the foregoing REPLY COMMENTS OF THE ASSOCIATION FOR LOCAL TELECOMMUNICATIONS SERVICES were served via hand delivery\* or first class mail, postage prepaid, to the parties on the attached service list.

A handwritten signature in cursive script, appearing to read "Susan Dykeman", written over a horizontal line.

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